

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PEANUTS WORLDWIDE LLC,

Plaintiff,

V.

THE PARTNERSHIPS AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE "A."

Defendants.

CASE NO. 1:21-CV-05331

**DECLARATION OF ELENA STOYCHOVSKA IN SUPPORT OF MOTION TO  
DISSOLVE TEMPORARY INJUNCTION**

Elena Stoychovska, being duly sworn, declares the following to be true under the penalty of perjury:

1. I am a member of Defendant Sensible Store (“Defendant”) and I make this Declaration in support of the Defendant’s motion to dissolve temporary injunction. Everything stated herein is true and I would testify in conformity herewith if called to do so in person.
2. I received no notice of any of the hearings on the temporary injunction set by Plaintiff. Nor have I yet to be served or receive a copy of the complaint in this case from counsel for the Plaintiff.
3. Defendant has no connections to Illinois, no residence, no business, no employees and no bank accounts. The store we operate on amazon is called Sensible Store and the harm that Plaintiff is doing to us on that particular platform is the subject of this lawsuit.
4. Plaintiff has grouped all Defendants and claimed we are selling items that infringe on a

2. I received no notice of any of the hearings on the temporary injunction set by Plaintiff. Nor have I yet to be served or receive a copy of the complaint in this case from counsel for the Plaintiff.

3. Defendant has no connections to Illinois, no residence, no business, no employees and no bank accounts. The store we operate on amazon is called Sensible Store and the harm that Plaintiff is doing to us on that particular platform is the subject of this lawsuit.

4. Plaintiff has grouped all Defendants and claimed we are selling items that infringe on a

trademark depicting Peanuts.

5. We have never sold the alleged products in Illinois.

6. We sold seven non-infringing, non-counterfeiting Peanut's bedding sets, and each set was priced at \$79.96, for a total sale of \$559.72. The profit from these sales was \$11.00. These sales are less than one percent of our total sales on our store front.

7. On October 19, 2021, Amazon advised us that our accounts were frozen pursuant to this matter. The total amount of funds frozen is \$97,706.47. We have access to none of our money for sales from the non-infringing items.

Dated: November 9, 2021

  
\_\_\_\_\_  
Elena Stoychovska